

HEATHER E. WILLIAMS, #122664  
Federal Defender  
Noa E. Oren, #297100  
Assistant Federal Defender  
801 I Street, 3<sup>rd</sup> Floor  
Sacramento, CA 95814  
Tel: (916) 498-5700  
Fax: (916) 498-5710  
[Noa\\_oren@fd.org](mailto:Noa_oren@fd.org)

Attorney for Defendant  
JARIN CRUZ-ROSALES

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:22-cr-00190-JAM
	)	
Plaintiff,	)	<b>STIPULATION AND ORDER TO</b>
	)	<b>CONTINUE STATUS CONFERENCE</b>
vs.	)	
	)	
JARIN CRUZ-ROSALES	)	Date: June 27, 2023
	)	Time: 9:00 a.m.
Defendant.	)	Judge: John A. Mendez
	)	
_____	)	

IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States Attorney through James Conolly, Assistant United States Attorney, attorneys for Plaintiff, and Heather Williams, Federal Defender, through Assistant Federal Defender Noa Oren attorneys for Jarin Cruz-Rosales, that the status hearing be continued to September 12, 2023, and that the Court exclude time pursuant to the Speedy Trial Act.

Defense will be receiving additional discovery shortly and desires additional time to review it, consult with her client who is housed at Butte County Jail, to evaluate potential defenses, and to otherwise prepare for trial.

Defense counsel believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

The government does not object to the continuance.

1 Based upon the foregoing, the parties agree time under the Speedy Trial Act should be  
2 excluded from this order's date through and including September 12, 2023, as previously  
3 ordered, pursuant to 18 U.S.C. §3161 (h)(7)(A) and (B)(iv)[reasonable time to prepare] and  
4 General Order 479, Local Code T4 based upon continuity of counsel and defense preparation.

5 Dated: June 26, 2023

6 HEATHER E. WILLIAMS  
Federal Defender

7  
8 /s/ Noa Oren  
NOA E. OREN  
Assistant Federal Defender  
Attorney for Defendant  
9 JARIN CRUZ-ROSALES  
10

11 Dated: June 26, 2023

12 PHILLIP A. TALBERT  
United States Attorney

13 /s/ James Conolly  
14 JAMES CONOLLY  
Assistant United States Attorney  
Attorney for Plaintiff  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date the parties stipulated, up to and including September 12, 2023, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and(B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). **It is further ordered** the June 27, 2023 status conference shall be **CONTINUED** until **September 12, 2023, at 9:00 a.m.**

Dated: June 26, 2023

/s/ John A. Mendez

---

THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE